

SOUTH CAROLINA PUBLIC SERVICE COMMISSION**DOCKET NO. 2019-224-E****DOCKET NO. 2019-225-E**

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| In the Matter of: |) | DUKE ENERGY CAROLINAS, LLC'S |
| |) | AND DUKE ENERGY PROGRESS, |
| South Carolina Energy Freedom Act |) | LLC'S FIRST SET OF REQUESTS |
| (H.3659) Proceeding Initiated |) | FOR PRODUCTION OF |
| Pursuant to S.C. Code Ann. Section |) | DOCUMENTS AND |
| 58-37-40 and Integrated Resource |) | INTERROGATORIES TO NATURAL |
| Plans |) | RESOURCES DEFENSE COUNCIL, |
| |) | SOUTHERN ALLIANCE FOR |
| |) | CLEAN ENERGY, SEIRRA CLUB, |
| |) | SOUTH CAROLINA COASTAL |
| |) | CONSERVATION LEAGUE AND |
| |) | UPSTATE FOREVER |

Duke Energy Carolinas, LLC (“DEC”) and Duke Energy Progress, LLC (“DEP”) (together, “Duke Energy” or the “Companies”), by and through their legal counsel, pursuant to Rule 103-833(C) of the Rules of Practice and Procedure of the South Carolina Public Service Commission, hereby serves Natural Resources Defense Council, Southern Alliance Clean Energy, Sierra Club, South Carolina Coastal Conservation League, and Upstate Forever (“Environmental Parties”) with the following First Set of Requests for Production and Interrogatories to be answered under oath on or before twenty (20) days from the date of service.

Further, please take notice that these Requests for Production and Interrogatories (which may individually or together be herein referred to as “Request” or “Requests”) are continuing in nature until the date of the hearing, and that any information or responsive materials identified after your responses have been served upon the undersigned counsel

should be provided via supplemental discovery responses as soon as possible after such identification.

INSTRUCTIONS

1. Please produce the requested documents as they are kept in the usual course of business or to organize and label them to correspond with the categories in the Request. Documents attached to each other should not be separated.

2. In producing Documents, furnish all documents known or available to you, regardless of whether such documents are possessed directly by you or your agents, employees, representatives, investigators, or by your attorneys. All requests for Documents specifically request documents of Environmental Parties as well as Energy Futures Group, Jim Grevatt, and Wilson Energy Economics, James F. Wilson, who you have retained to provide expert testimony in this proceeding.

4. If any document otherwise responsive to any Request was, but is no longer, in your possession, subject to your control or in existence, identify each document by listing its author(s) and addressee(s), date, subject matter, whether the document(s) or copies are still in existence (and if so, their locations and the custodians), as well as whether the document is missing or lost, has been destroyed, has been transferred voluntarily to others, or has been otherwise disposed of. In each instance, explain the circumstances surrounding such disposition and identify the person(s) directing or authorizing its destruction or transfer, and the date(s) of such direction or authorization.

5. If a privilege or objection as to any Request is claimed, identify with specificity the matter as to which the privilege or objection is claimed, the nature of the

privilege or objection, and the legal and factual basis for each such claim, and provide a complete description of the information or document being withheld.

6. Unless otherwise stated, the relevant time period for these Requests is from January 1, 2018 to the present, as updated based upon the continuing nature of these Requests.

7. Each Request shall be reproduced at the beginning of the response thereto.

8. Please provide copies of the information responsive to each Request in native electronic working format with all data and formulas intact.

9. Please provide responses to the following Requests electronically. To the extent this is impracticable, the responses, including any responsive Documents, should be provided at the offices of Robinson, Gray, Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201, or some mutually convenient location otherwise agreed to by the parties.

DEFINITIONS

1. **“Commission”** means the Public Service Commission of South Carolina.

2. **“Communication”** means the transmittal of information in the form of facts, ideas, Documents, inquiries, or otherwise, including every discussion, conversation, conference, or telephone call.

3. **“You”** and **“your”** means the Environmental Parties and your witnesses in this proceeding, including but not limited to, Energy Futures Group, and Wilson Energy Economics, and all of their respective members, agents, representatives and attorneys.

4. **“Dockets”** means Commission Docket Nos. 2019-224-E and 2019-225-E.

5. The term **“document”** is to be construed as broadly as permissible under Rule 34 of the South Carolina Rules of Civil Procedure and includes, but is not limited to, any printed, typewritten, handwritten or otherwise recorded information of whatever character, including, but not limited to, letters, memoranda, notes, diaries, reports, records, calendars, charts, audio and/or video tapes or discs, and photographs; computer programs or disks; electronic media records, however recorded and maintained, including, but not limited to, electronic mail, voicemail messages, digital photographs and electronically scanned records of any type; recorded observations, statements, conversations or formal affidavits. Any carbon or photocopy of any such materials upon which notations have been made and all drafts are also included.

6. **“Person”** means any natural person or any business, legal, or governmental entity or association.

7. The terms **“related to”** and **“relating to”** or any variation thereof shall be construed to include refer to, summarize, reflect, constitute, contain, embody, mention, show, comprise, evidence, discuss, describe, comment on, concerning, regarding, eluding to, pertaining to, probative of, in connection with, dealing with, in respect of, about, involved, identifying or proving.

8. **“Identify,”** when referring to a Person, means to give, to the extent known, the Person’s full name, present or last known address, and when referring to a natural Person, additionally, the present or last known place of employment.

9. **“Identify,”** when referring to Documents, means to give, to the extent known, the (i) type of Document; (ii) general subject matter; (iii) date of the Document; and (iv) authors, addressees and recipients.

10. **“Identify,”** when referring to an oral Communication, means to give, to the extent known, the identity of the speaker and of each Person who was present when the Communication was spoken, and the substance, date, and place of such Communication.

INTERROGATORIES

1-1. “Emerging technologies” are referenced on pages 4, 5, and 15 of Jim Grevatt’s direct testimony, and on pages 5-6 of Exhibit A to Mr. Grevatt’s direct testimony. Please provide the following as related to these “emerging technologies”:

- a. A definition of ‘emerging technology’ that can be used to categorize measures as “emerging technologies” in a market potential study;
- b. Names and detailed descriptions of emerging technologies you have identified; and
- c. The cost and savings assumptions associated with the identified emerging technologies, as specifically applicable to the DEC and DEP service territories, to include estimates of cost-effectiveness and what test was used to determine such cost-effectiveness, and all underlying assumptions.

ANSWER:

1-2. On page 5 of Mr. Grevatt’s testimony, he states the following: “The MPS failed to account for potential savings that could result from promotion of emerging technologies, instead only considering ‘existing technology and market trends as observed with currently available data.’” Please describe in detail technologies, other than those in existence, and market trends, other than those observed with currently available data, that should have been included in the Market Potential Study.

ANSWER:

1-3. Please describe in detail your understanding of what assumptions were used in the Companies' IRPs specifically related to the inclusion of emerging technologies, cost effectiveness screening and levelized costs of energy efficiency.

ANSWER:

1-4. Page 7 of Exhibit A to Mr. Grevatt's direct testimony lists nineteen measures that Mr. Grevatt asserts were omitted from Nexant's Market Potential Study. Please provide the following as related to these measures:

- a. A complete description of each measure;
- b. A list of utilities and jurisdictions that use each of these programs;
- c. The basis for Mr. Grevatt's opinion that the Companies do not already implement these programs;
- d. The basis for Mr. Grevatt's opinion that each of the "omitted measures" is cost-effective within the DEC and DEP service territories;
- e. The cost and savings assumptions associated with these measures, the measures' TRC and UCT scores, and other relevant estimates of such measures' cost-effectiveness and what test was used to determine such cost-effectiveness.

ANSWER:

1-5. On page 9 of Exhibit A to Mr. Grevatt's direct testimony, Exhibit A references data from the Energy Information Administration. Please provide the following:

- a. A complete explanation as to what comprises the referenced “Other” category in the EIA’s CBECS and RECS and reference the source for your response.
- b. Please identify where in Table CE5.1b of the EIA RECS the table “indicates an ‘Other’ end-use electricity consumption of 48 billion kWh out of the total electricity consumption of 287 billion kWh.” If this statement is derived from a calculation, please provide the underlying calculation, data, and source for the data.
- c. Please explain how the EIA data Mr. Grevatt relies upon, which applies to the South Atlantic census division, is more accurate than data used by the MPA, which is specific to the Companies.

ANSWER:

1-6. On page 10 of Exhibit A to Mr. Grevatt’s direct testimony, Mr. Grevatt references future improvements in measure efficiency and cost. Please describe all measures Mr. Grevatt anticipates improving in efficiency or cost, describe with specificity such improvements, and provide all underlying or supporting source data, documents, and calculations.

ANSWER:

1-7. Please describe in detail Mr. Grevatt’s experience with IRP preparation and modeling.

ANSWER:

1-8. Please identify any production cost modeling work or production cost modeling studies that Mr. Grevatt has completed on behalf of (i) an electric utility, (ii) State Public Service Commission or Regulatory Authority responsible for regulating utility resource planning, or (iii) an intervenor in a proceeding before a State Public Service Commission or Regulatory Authority, relating to integrated resource planning within the last five (5) years as well as identification of the particular state docket number.

ANSWER:

1-9. Please list each utility Integrated Resource Plan proceeding in which Mr. Grevatt has testified as an expert.

ANSWER:

1-10. Please describe in detail your Mr. Grevatt's understanding of what assumptions were used in the Companies' IRPs specifically related to the inclusion of emerging technologies, cost effectiveness screening and levelized costs of energy efficiency.

ANSWER:

1-11. On page 5 of his direct testimony, Mr. Grevatt states that Duke should revise the IRP "to account for the higher, more realistic estimates of potential" based on the Winter Peaking Assessment ("WPA"). Please identify with specificity the potential Mr. Grevatt identified in the WPA that was omitted in the DSM/EE portion of the IRP, and

indicate what portion of that potential is attributed to new or enhanced EE or DSM programs and what portion is attributed to new rate structures.

ANSWER:

1-12. On page 5 of his direct testimony, Mr. Grevatt states that Energy Futures Group (“EFG”) compared Duke’s MPS to other potential studies and best practices. Please provide the following information for each of the potential studies EFG consulted when conducting its review:

- a. the utility for which the study was performed;
- b. the specific state or region of the country for which the study was performed or in which state or region the utility operates, whichever is applicable;
- c. the consultant that performed the study; and
- d. the similarities between the utility that is the subject of the study and the Companies that led EFG to conclude that the study would be comparable to the MPS.

ANSWER:

1-13. Describe with specificity the economies of scale referenced on page 8 of Mr. Grevatt’s direct testimony and provide the estimated cost reductions Duke should include and source documentation for that estimate.

ANSWER:

1-14. In reference to page 8 of Mr. Grevatt's direct testimony, describe the measure cost decreases Mr. Grevatt estimates occurring during the IRP planning period and provide source documentation for those decreases.

ANSWER:

1-15. On page 8, Mr. Grevatt cites "market acceptance" as a driver of lower measure costs with LEDs as an example. "Market acceptance" is often considered a driver of increasing free ridership and is one reason that Duke no longer claims savings for standard A19 LED bulbs. Please explain how Mr. Grevatt would advise a utility to capitalize on market acceptance without increasing free ridership.

ANSWER:

1-16. Does Mr. Grevatt anticipate that federal appliance standards will remain static for the duration of the IRP planning period? If so, provide support for that belief. If not, describe the effect that Mr. Grevatt expects changing federal appliance standards will have on utility energy efficiency program potential.

ANSWER:

1-17. On page 14 of his direct testimony, Mr. Grevatt asserts that the UCT is a better screen for potential than the TRC because the UCT is the cost effectiveness test that the Companies will use in program planning.

- a. What cost effectiveness test is used in the potential studies Mr. Grevatt used as comparison studies?

- b. Please explain whether Mr. Grevatt believes there is a correlation between the cost-effectiveness of a measure to a customer and the measure's adoption rates.
- c. What correlations does Mr. Grevatt see between a measure passing the UCT and the customers' likelihood of adopting a measure that fails the TRC?
- d. Please describe Mr. Grevatt's understanding of the assumptions for cost effectiveness screening used by the Companies in the forecast of EE savings included in the Companies' IRPs.

ANSWER:

1-18. Please provide the following information as related to the ACEEE study cited to by Mr. Grevatt on page 12 of his direct testimony:

- a. The cost-effectiveness score used by ACEEE in the referenced meta-analysis of potential; and
- b. A list of states or utilities that are comparable to the Companies cited to by ACEEE in the study.

ANSWER:

1-19. On page 12, Mr. Grevatt states that residential behavioral programs "typically have very short persistence—meaning their savings do not accumulate or persist over time." Please specifically define and quantify what is meant by "very short persistence" and "persist over time," and provide any and all source data supporting your position.

ANSWER:

1-20. On page 12, Mr. Grevatt states that residential behavioral programs “tend to be more expensive than other longer-lived measures.” Please provide specific examples of how behavioral programs are more expensive than other longer-lived measures. Please also explain whether Mr. Grevatt believes that non-lighting equipment-based programs are less expensive than behavioral ones, and please provide support for your response.

ANSWER:

1-21. Please provide a list of dates and times of meetings or webinars hosted by the Companies or the Collaborative that were attended by Mr. Grevatt or Mr. Mellinger during which the Companies’ MPS, IRP, or WPA were discussed. In the list please indicate which of the topics were discussed at each meeting.

ANSWER:

1-22. On pages 19 and 20 of Exhibit A to Mr. Grevatt’s direct testimony, the Report discusses assumptions related to opt-out customers not being counted in the DSM potential. Is it Mr. Grevatt’s or EFG’s position that a customer who is opted out of DSM Programs cannot participate in an EE Program offered by the Companies? Please provide Mr. Grevatt’s opinion as to whether being an opted out customer prohibits a customer from undertaking DSM outside of a Duke Program.

ANSWER:

1-23. On page 8 of his direct testimony, Mr. Grevatt states that “[m]any technologies have well established track records of energy improvement over time, such as LED lighting and heat pumps.” As related to this statement, please provide the following:

- a. Specific examples and source documentation of “energy improvements” that such improvements have been achieved overtime.
- b. Details, including all examples and source documentation, regarding the energy improvements associated with LEDs and Heat Pumps that were referenced.
- c. An exhaustive list of the “many technologies [that] have well established track records of energy improvement over time”—not including LEDs and Heat Pumps—including detailed descriptions of such technologies and their associated “energy improvements.”

ANSWER:

1-24. On Page 9 of Exhibit A to Mr. Grevatt’s direct testimony, Exhibit A discusses the “high-growth potential” of Heat Pump Water Heaters and Heat Pump clothes dryers. Please provide verifiable projections, underlying workpapers, and all related documentation for this potential.

ANSWER:

1-25. For how long, or since what year, has each of the following organizations, or a representative of the organization (e.g., the Southern Environmental Law Center) been aware of or participated in the Duke Companies' EE Collaborative?

- a. Southern Alliance for Clean Energy
- b. S.C. Coastal Conservation League
- c. Upstate Forever
- d. Sierra Club
- e. Natural Resources Defense Council

ANSWER:

1-26. On page 6, at paragraph 12b, of Exhibit B to James Wilson's direct testimony, it states as follows:

In addition, the RA Studies used 39 years of temperature data (1980-2018), weighted equally, which includes many instances of very extreme cold that have not been seen in these areas, or only rarely, for decades. This overstates the likely frequency of such extreme cold going forward, amplifying the effect of overstating the impact of extreme cold on winter peak loads.

- a. Please explain how using the exact frequency and timing of the past historical weather overstates the frequency of those events moving forward.
- b. Please provide your recommendation for the number of historic weather years that should be used in the resource adequacy study, the weighting for each weather year and the basis for your recommendations.

ANSWER:

1-27. On page 6, at paragraph 13, of Exhibit B to James Wilson's direct testimony, it states as follows:

While a number of other assumptions adopted in the RA Studies that impact the physical reliability results appear very conservative and could be questioned (such as, external region and market diversity and potential assistance, and demand response operational limits), this report focuses on the issues identified in the previous paragraph.

- a. Please describe and provide any analysis performed on external diversity/assistance to support this statement.
- b. Please describe and provide any analysis performed on demand response operations to support this statement.

ANSWER:

1-28. On page 12, at paragraph 27, of Exhibit B to James Wilson's direct testimony, it states as follows:

[O]nce temperatures drop to the teens, customers are likely already operating space heating equipment at maximum levels; if temperatures fall even lower, few customers have additional equipment they can turn on.

- a. Have you conducted any temperature and load analyses of the DEC and DEP service territories to support this claim?
- b. Please provide any supporting evidence for these statements.
- c. At what temperature do you believe that DEC and DEP customers run out of additional heating equipment that they can turn on?
Please provide evidence supporting this claim.

ANSWER:

1-29. As related to Figures JFW-1 and JFW-2 in Exhibit B to James Wilson's direct testimony, please provide the following:

- a. Please provide any workpapers and analysis for the calculations of the regressions in Figures JFW-1 and JFW-2, including any code developed, the inputs of any code developed and the outputs of any code developed.
- b. For the DEP regression in JFW-2, please explain why you consider the 10-11 degree temperature range an outlier.

ANSWER:

1-30. On page 16, at paragraph 36, of Exhibit B to James Wilson's direct testimony, it states as follows:

[T]he high sensitivity of the regression results to these choices demonstrates the arbitrary nature of the regression approach.

- a. Please provide the supporting evidence and describe in detail the process for the selection of your data points.

ANSWER:

1-31. On page 26, at paragraph 58.c, of Exhibit B to James Wilson's direct testimony, it states as follows:

Third, note that this was a quite unusual date – the outage was very early Tuesday morning following a three-day New Year's weekend. Perhaps if this extreme cold had occurred under more regular circumstances the plant staff could have addressed the cold-related problems that arose without having to take a forced outage during the morning peak period of a day when extremely high loads were expected due to the extreme cold.

- a. Please provide any information or evidence supporting the assertion that holiday periods affect the management of plants especially during cold weather, and describe in detail your reasoning supporting this statement.

ANSWER:

1-32. On page 27, at paragraph 61, of Exhibit B to James Wilson's direct testimony, it states as follows:

While, as the RA Study recognizes, cold weather outages can be substantially higher or lower than 400 MW, it is important to keep in mind that the RA Studies perform probabilistic simulations, intended to estimate the likelihood of loss of load. Thus, all assumptions should either be probabilistic, or set at likely values rather than extreme values. Conservatism in planning is appropriate, but it should be transparent and based on unbiased analysis rather than baked into the underlying analysis through various conservative assumptions. I conclude that a value closer to 200 MW would be a better estimate of cold weather outages in future years for the purposes of the resource adequacy analyses.

- a. Please provide your workpapers and analysis that support a 200 MW recommendation in regard to cold weather outages.
- b. Please provide your recommendation and explain your reasoning for the temperature threshold to which the 200 MW should be applied.

ANSWER:

1-33. On page 38, at paragraph 94, of Exhibit B to James Wilson's direct testimony, it states as follows:

A more balanced seasonal weighting of resource adequacy risk is also suggested by the simple fact that the majority of high load hours are in summer on both systems. According to DEC's load forecast, 92% of the

highest load hours (top 1%) are in summer; for DEP's load forecast, 60% of the top 1% load hours are in summer.

- a. Is this assessment based on load net of must take solar output?
- b. If this assessment is not based on load net of must take solar output, please provide the percent of the highest load hours for summer and winter after accounting for load net of must take solar output.

ANSWER:

1-34. As provided in the instructions to these Interrogatories, if a privilege or objection as to any Request is claimed, identify with specificity the matter as to which the privilege or objection is claimed, the nature of the privilege or objection, and the legal and factual basis for each such claim, and provide a complete description of the information or document being withheld.

ANSWER:

REQUESTS FOR PRODUCTION

1-1. Please produce copies of all data requests, requests for production, interrogatories, or other communications that have been received by Environmental Parties in connection with this docket. Please produce these as soon as practicable after they are received. Please consider this an ongoing request.

RESPONSE:

1-2. Please produce copies of Environmental Parties' responses to all data requests, requests for production, interrogatories, or any other information provided by Environmental Parties in connection with this docket. This includes all documents, electronic files or other attachments that were that were provided, or made available for on-site inspection. Please produce these at the same time they are provided to the requesting party, or if that is impossible, as soon as practicable thereafter.

RESPONSE:

1-3. Please produce copies of all data requests, requests for production, interrogatories, or any other request for information that SACE/CCL has served on other parties in connection with this docket. Please produce these at the same time they are served on the other party. Please consider this an ongoing request.

RESPONSE:

1-4. Please produce copies of the responses to all data requests, requests for production, interrogatories, or any other request for information that Environmental Parties

has served on other parties in connection with this docket. Please produce these as soon as practicable after they are received. Please consider this an ongoing request.

RESPONSE:

1-5. Please provide the ACEEE study that Mr. Grevatt cites on page 12 of his direct testimony.

RESPONSE:

1-6. Please produce any and all documents—as defined above—identified, referred to, or relied upon in preparing your response to each Interrogatory of Duke Energy’s First Set of Interrogatories to Environmental Parties.

RESPONSE:

1-7. Please produce any and all prepared testimony, pre-filed testimony, exhibits, deposition transcripts, and hearing transcripts associated with the following items listed in Mr. Grevatt’s “Selected Projects” in Exhibit B to Mr. Grevatt’s direct testimony:

- a. The Coalition for Affordable Utility Services and Energy Efficiency in Pennsylvania (“CAUSE-PA”). Provided expert witness testimony in support of robust low income efficiency programs in Philadelphia Gas Works Petition for Approval of Demand-Side Management Plan and PECO, Duquesne, and First Energy Act 129 Phase IV Plan proceedings.

- b. Appalachian Voices and Natural Resources Defense Council. Provided expert witness testimony in Virginia Electric and Power Co. Phase VIII DSM Program Application.
- c. Citizens Action Coalition of Indiana. Provided expert witness testimony in Duke Energy Indiana 2020-2023 DSM Plan.
- d. Southern Alliance for Clean Energy and Earthjustice. Provided expert witness testimony in the Florida Energy Efficiency and Conservation Act goal setting proceeding.
- e. Energy Efficient West Virginia, West Virginia Citizen Action Group, and Earthjustice. Provided expert witness testimony in Appalachian Power Company and Wheeling Power Company's Petition regarding EE/DR program approvals.
- f. Natural Resources Defense Council and Sierra Club. Provided expert witness testimony in Public Service Company of Colorado's Strategic Issues, 2019-2020 DSM Plan, and 2021-2022 DSM Plan proceedings.
- g. Natural Resources Defense Council and Sierra Club. Provided expert witness testimony in Nevada Energy Company's 2019-2038 Triennial Integrated Resource Plan and 2019-2021 Energy Supply Plan, and 2019 and 2020 DSM Update proceedings and participated in stakeholder collaboratives.

RESPONSE:

1-8. On page 7, at paragraph 14, of Exhibit B to James Wilson's direct testimony, it states as follows:

The majority of the winter hours with loss of load are from scenarios under which the DEC load was 106% of the value on the Winter Peak Study's Study Peak Day or higher. Fully 94% of the loss of load in the DEC RA Study occurs on days with loads in excess of the Study Peak Day value. In the DEP RA Study, the majority of the load loss is in hours with load 114% of the Study Peak Day peak load or higher. 99% of the loss of load in the DEP RA Study occurs under loads in excess of the Study Peak Day value."

- a. Please provide workpapers supporting these statements.

RESPONSE:

1-9. On page 8, at paragraph 17, of Exhibit B to James Wilson's direct testimony, it states as follows:

If the flaws I have identified were even partially corrected, the 14.5% summer planning reserve margin that was in place until the 2016 IRP, which would provide a 16.5% winter reserve margin, would be more than adequate.

- a. Please provide all workpapers and analysis conducted to support this reserve margin recommendation.

RESPONSE:

1-10. On page 12, at paragraph 27, of Exhibit B to James Wilson's direct testimony, it states as follows:

In addition, the winter peak loads under extreme temperatures typically occur in the 7 to 9 AM time frame; under the very rare extreme cold conditions, some schools, offices, and other commercial, government and industrial facilities may open late, remain closed, or operate at reduced levels, reducing loads during the early morning peak on such days.

- a. Please provide all workpapers and analysis conducted to support this reserve margin recommendation.

RESPONSE:

1-11. On page 36, at paragraph 89, of Exhibit B to James Wilson's direct testimony, it states as follows:

The DEC RA Study assumed 1,122 MW of summer demand response and 461 MW of winter demand response (p. 37). An additional 500 MW of winter demand response would eliminate 60% of the winter load loss events in the simulations; 1,000 MW would eliminate 85%, allowing a considerably lower winter reserve margin and shifting resource adequacy risk toward summer. The DEP RA Study assumed 1,001 MW of summer demand response and 442 MW of winter demand response (p. 37). An additional 500 MW of winter demand response on the DEP system would eliminate almost 70% of the winter load loss events in the simulations; 1,000 MW would eliminate over 90%.

- a. Please provide your workpapers and calculations supporting these claims.

RESPONSE

1-12. As provided in the instructions to these Requests, if a privilege or objection as to any Request is claimed, identify with specificity the matter as to which the privilege or objection is claimed, the nature of the privilege or objection, and the legal and factual basis for each such claim, and provide a complete description of the information or document being withheld.

RESPONSE:

Dated this 12th day of February, 2021.

/s/Heather S. Smith

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